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 CIRCUIT CO., LTD.**

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

MICRON TECHNOLOGY, INC.,  
 Plaintiff,

v.

UNITED MICROELECTRONICS  
 CORPORATION, et al.,  
 Defendants.

**Case No. 3:17-CV-06932-MMC**

**STIPULATION AND [PROPOSED]  
 AMENDMENT TO PROTECTIVE  
 ORDER TO ADD PARTY; ORDER**

IT IS HEREBY STIPULATED by and between Plaintiff Micron Technology, Inc., (“Micron”) Defendant United Microelectronics Corporation (“UMC”), and Defendant Fujian Jinhua Integrated Circuit Co., Ltd. (“Jinhua”) through their respective attorneys of record to amend the current Protective Order (Dkt. 74) for the purposes of adding information related to Jinhua for the Protective Order and updating Exhibit A to the Protective Order. The Parties stipulate to being bound to the underlying Protective Order and the following amendments to the same:

**Change paragraph 2.4 of the Protective Order to read as follows:**

“2.4 Designated Corporate Representative: The two employees designated by each respective party, who are not involved with competitive decision making, and seek to have access to “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” information in this matter.

(a) Employees for Micron Technology, Inc.: Jan Bissey and one more to be named later.

(b) Employees for United Microelectronics Corporation: To be determined.

(c) Employees for Fujian Jinhua Integrated Circuit Co., Ltd.: To be determined.

**Change paragraph 2.5 of the Protective Order to read as follows:**

“2.5 Designated House Counsel: House Counsel who seek access to “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” information in this matter.

(a) In-house attorneys for Micron Technology, Inc.: David Ashmore, Esq. and Michael Myers, Esq.

(b) In-house attorneys for United Microelectronics Corporation: Lucas Chang and one other attorney to be named later.

(c) In-house attorneys for Fujian Jinhua Integrated Circuit Co., Ltd.: To be determined.

**Change Exhibit A of the Protective Order to read as follows:**

**“EXHIBIT A****ACKNOWLEDGMENT AND AGREEMENT TO BE BOUND**

I, \_\_\_\_\_ [print or type full name], of  
 \_\_\_\_\_ [print or type full address], declare under penalty of perjury  
 that I have read in its entirety and understand the Stipulated Protective Order that was issued by the  
 United States District Court for the Northern District of California on July 5, 2018, as amended on  
 February \_\_, 2019, in the case of *Micron Technology Inc. v. United Microelectronics Corp. et. al*,  
 Case No. 3:17-CV-06932-MMC. I agree to comply with and to be bound by all the terms of this  
 Stipulated Protective Order and I understand and acknowledge that failure to so comply could  
 expose me to sanctions and punishment in the nature of contempt. I solemnly promise that I will  
 not disclose in any manner any information or item that is subject to this Stipulated Protective  
 Order to any person or entity except in strict compliance with the provisions of this Order.

I further agree to submit to the jurisdiction of the United States District Court for the  
 Northern District of California for the purpose of enforcing the terms of this Stipulated Protective  
 Order, even if such enforcement proceedings occur after termination of this action.

I hereby appoint \_\_\_\_\_ [print or type full name] of  
 \_\_\_\_\_ [print or type full address and telephone number]  
 as my California agent for service of process in connection with this action or any proceedings  
 related to enforcement of this Stipulated Protective Order.

Date: \_\_\_\_\_

City and State where sworn and signed: \_\_\_\_\_

Printed name: \_\_\_\_\_

Signature: \_\_\_\_\_”

1 IT IS SO STIPULATED.

2 Dated: February 11, 2019

Respectfully submitted,

3 **JONES DAY**

4 By: s/ Randall E. Kay  
Randall E. Kay

5 *Attorneys for Plaintiff*  
6 *MICRON TECHNOLOGY, INC.*

7 **DAN JOHNSON LAW GROUP, LLP**

8 By: s/ Daniel Johnson, Jr.  
Daniel Johnson, Jr.

9 *Attorneys for Defendant*  
10 *UNITED MICROELECTRONICS*  
11 *CORPORATION, and FUJIAN JINHUA*  
12 *INTEGRATED CIRCUIT CO., LTD.*

13 **BRINKS GILSON & LIONE**

14 By: s/ Lyle B. Vander Schaaf  
Lyle B. Vander Schaaf

15 *Attorneys for Defendant*  
16 *FUJIAN JINHUA INTEGRATED CIRCUIT CO.,*  
17 *LTD.*

**FILER'S ATTESTATION**

Pursuant to Civil Local Rule 5.1, of the United States District Court of the Northern District of California, I certify that authorization for the filing of this document has been obtained from the other signatory shown above and that said signatory has authorized placement of his electronic signature on this document.

Dated: February 11, 2019

s/ Randall E. Kay

Randall E. Kay

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on February 11, 2019 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

Executed on February 11, 2019, at San Diego, California.

s/ Randall E. Kay

Randall E. Kay

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Maxine M. Chesney  
United States District Judge

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